

**From:** [Craig Ziady](#)  
**To:** [Zucker, Audrey](#); [Casey, Carolyn](#)  
**Cc:** [Wainberg, Daniel](#); [Gregory Flaherty](#); [Bruce Hoskins](#); [Steve Drohosky](#)  
**Subject:** RE: sampling results letter  
**Date:** Tuesday, May 29, 2018 1:52:34 PM  
**Attachments:** [Response to EPA comments 05 18.pdf](#)

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Hi Audrey – Please find enclosed our responses to EPA’s “draft” comments, and please find below the proposed timetable for the remaining site activities.

Please let me know if you have any questions.

Thank you.

Proposed Schedule

- Complete preliminary ecological reconnaissance work in field: by June 30, 2018
- Third round of groundwater sampling for non-vapor intrusion wells: by June 30, 2018
- BERA Work plan for revised QAPP for EPA review: by July 16, 2018
- EPA approval of BERA work plan and revised QAPP: by August 17, 2018
- PCB building sampling in Building 100 (former vocational school): by August 3, 2018
- Start BERA field sampling: by August 17, 2018
- End BERA field sampling: by September 14, 2018
- Fourth round of groundwater sampling for non-vapor intrusion wells: by September 28, 2018
- End BERA toxicity tests: by November 16, 2018
- BERA Toxicity lab report receipt: by December 14, 2018
- Draft RCRA Facility Investigation (RFI) Report – to include BERA report, human health risk assessment, and data validation as appendices: by February 15, 2019
- EPA approval of RFI: by March 15, 2019
- Environmental Indicators Submittal: by March 29, 2019
- Media Cleanup Standards (MCS) Proposal: by April 19, 2019
- EPA approval of MCS : by May 17, 2019
- Draft Corrective Measure Study (if needed): by August 30, 2019

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**From:** Zucker, Audrey [<mailto:Zucker.Audrey@epa.gov>]  
**Sent:** Thursday, May 24, 2018 4:09 PM

**To:** Craig Ziady; Casey, Carolyn  
**Cc:** Wainberg, Daniel; Gregory Flaherty; Bruce Hoskins; Steve Drohosky  
**Subject:** RE: sampling results letter

Craig – Your email does not provide a proposed date for your response to Carolyn’s 5/16 email. We are therefore requesting that you provide us with that response by no later than 5/31/18.

Also, please be reminded that your detailed proposed schedule was due on May 18, but we haven’t received it. We are requesting that you submit that schedule as soon as possible, but no later than 5/31. To remind you, at our 5/8 meeting we discussed a comprehensive schedule of all remaining activities under the order, not just ecological activities.

As to the other issues raised in your email, we do need Carolyn’s concerns to be addressed before we can move forward being able to concur on a draft letter to the day care facilities. Some of Carolyn’s concerns are fundamental to our review of your draft letter.

To the extent that Carolyn’s comments were marked “draft”, she was merely trying to flag that EPA has issues with your submission that need to be addressed. Carolyn has been conferring with MassDEP and will send an email reiterating her concerns and include some of MassDEP’s feedback.

Audrey

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**From:** Craig Ziady [<mailto:craig@cummings.com>]  
**Sent:** Tuesday, May 22, 2018 3:29 PM  
**To:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>  
**Cc:** Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>; Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>; Bruce Hoskins <[bhoskins@fslassociates.com](mailto:bhoskins@fslassociates.com)>; Steve Drohosky <[sjd@cummings.com](mailto:sjd@cummings.com)>  
**Subject:** RE: sampling results letter

Hi Audrey – Thanks for your note. I had not realized that Bruce was not copied on Carolyn’s comments. We have just spoken about them, and we will have a response for you shortly. I’m not sure I understand, however, why the comments on the proposed letter to Mr. Drohosky need to be delayed pending a response to Carolyn’s comments. We continue to believe it is important to communicate with our clients about the testing sooner rather than later. Also, the idea that Carolyn’s comments are “draft” comments and that some more fulsome comments may still be forthcoming – likely after we have responded to the draft comments – does not present as terribly efficient. We are working hard to be responsive to your requests at the same time we are continuing to advance the significant field activities of the Consent Order – all while keeping our clients apprised of ongoing activities. In this regard, I am working on finalizing a proposed timetable for ecological site activities, and will have that to you today or tomorrow, I believe, under separate cover.

If you have any questions in the meantime, please let me know.  
Thank you.  
Craig

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**From:** Zucker, Audrey [<mailto:Zucker.Audrey@epa.gov>]  
**Sent:** Tuesday, May 22, 2018 12:20 PM  
**To:** Casey, Carolyn; Craig Ziady  
**Cc:** Wainberg, Daniel; Gregory Flaherty  
**Subject:** RE: sampling results letter

Craig – Just to be clear, with respect to the draft letter to the day care centers that you provided to us on May 8<sup>th</sup>, we will provide you with comments after you have addressed the issues in Carolyn's May 16 email below.

Please let me know when we can expect your responses to Carolyn's email. Thanks.

(fyi--Carolyn has been out of the office unexpectedly. So, I just wanted to make sure that you understood that we do plan to comment on your May 8 draft letter.)

Audrey

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**From:** Casey, Carolyn  
**Sent:** Wednesday, May 16, 2018 8:30 AM  
**To:** Craig Ziady <[craig@cummings.com](mailto:craig@cummings.com)>  
**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>; Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>  
**Subject:** RE: sampling results letter

For each suite, the sample results should be provided along with the letter and include an appropriate evaluation of the data. We are still in disagreement with the conclusion that no vapor intrusion is occurring. We should resolve this prior to providing that information to the suite managers/parents.

I also have comments on the progress report and until they are addressed, it would not be appropriate to share the data. Draft comments attached.

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**From:** Craig Ziady [<mailto:craig@cummings.com>]  
**Sent:** Tuesday, May 15, 2018 1:22 PM  
**To:** Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>  
**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>; Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>  
**Subject:** sampling results letter

Hi Carolyn – Now that the April 2018 Progress Report is complete, we would like to finalize the letter to the clients in whose premises the indoor air testing occurred. You had requested an opportunity to review this letter, and we provided a draft on May 8 during our meeting. Could you please confirm ASAP whether you have any comments.

Thank you.

Craig

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